



LINCOLN COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH

1242763 - R8 SDMS

August 24, 2012

Mr. Victor Ketellapper
U.S. Environmental Protection Agency
1595 Wynkoop St. (8EPR-SR)
Denver, CO 80202

Mr. John Podolinsky
Montana Department of Environmental Quality
PO Box 200901
Helena, MT 59620-0901

Mr. Ketellapper / Mr. Podolinsky,

As you are aware, the Lincoln County landfill sites in both Libby and Troy, MT both accept wood waste debris from residential and commercial entities within Lincoln County. Historically, this wood waste material was processed through chipping and/or burning. The resulting processed material was then either sold for re-use, or disposed of at the landfill sites. As part of the ongoing work associated with the Libby Superfund Site, the U.S. Environmental Protection Agency (EPA) and the Montana Department of Environmental Quality (DEQ) have been working to determine the presence or absence of Libby amphibole asbestos (LA) within the wood waste through sampling and analysis activities. It is the understanding of Lincoln County that the EPA and DEQ intended to utilize data from this sampling event to evaluate the potential health risks associated with processing, disposal, and re-use of the wood waste material.

Sampling activities were completed at the Libby and Troy landfill sites on May 30th and June 1st, 2012 respectively. Based on the sampling and analysis plan prepared by Tetra Tech, a total of 16 samples were collected from the Libby landfill site and 9 samples were collected from the Troy landfill site. To date, Lincoln County has only received preliminary/unvalidated results for 19 of these samples.

Due to storage capacity issues at each landfill site, Lincoln County is proceeding with plans to process the existing wood waste material. Lincoln County's contractor is scheduled to begin chipping the brush pile located at the Libby landfill site on August 30, 2012. Exact plans for disposal/re-use have not been determined at this point.

Through this letter, Lincoln County is requesting the following items:

- A copy of the final/validated results for all wood waste samples collected at the Libby and Troy landfill sites.
- A written response to this letter, prior to August 30, detailing all restrictions imposed by the EPA or DEQ for the processing, disposal, and re-use of the wood waste material at each site.

A timely response to this request is critical to prevent the disruption of landfill site operations. Please feel free to contact Kathi Hooper (406-283-2440, khooper@libby.org) or Nick Raines (406-283-2462, nraines@libby.org) with Lincoln County Department of Environmental Health for additional information regarding the planned processing activities, or with questions related to this letter.

Sincerely,


Kathi Hooper
Director